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*Attorneys for Mark D. Waldron, Chapter 7 Trustee*

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington  
corporation,  
Debtor.

Case No. 18-03197-FPC

The Honorable Frederick P. Corbit

Chapter 7

**DECLARATION OF PAMELA M.  
EGAN IN SUPPORT OF  
CHAPTER 7 TRUSTEE'S REPLY  
TO OBJECTION FILED BY MR.  
ELLISON [ECF NO. 1021]**

I, Pamela M. Egan, pursuant to 28 U.S.C. § 1746 hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent  
to make this Declaration.

2. I submit this declaration in support of the [Chapter 7 Trustee's Reply  
to Objection Filed by Mr. Ellison \[ECF No. 1021\]](#) ("Reply"), ECF No. 1022,

3. Exhibit A to the Reply is a true and correct copy of excerpts of the  
[Defendant's Opposition to Trustee's Motion for Injunctive Relief](#), dated December

EGAN DECL. IN SUPP. OF CHAPTER  
7 TRUSTEE'S REPLY TO OBJECTION  
FILED BY MR. ELLISON [ECF NO. 1021] – Page 1

1 9, 2021, filed in this Court in *Waldron v. Dam*, Case No. 2:21-ap-80053, ECF No.  
2 28 at 6:25-28, 7:1-12.

3 4. Exhibit B to the Reply is a true and correct copy of the [Order](#)  
4 [Denying Appellant's Motion to Seal](#), *Dam v. Waldron*, dated June 8, 2022, U.S.  
5 District Court, E.D.W.A., Case No. 2:21-cv-00291-SAB, ECF No. 36.

6 5. Exhibit C to the Reply is a true and correct copy of excerpts of the  
7 Trustee's unredacted Verified Complaint that Mr. Dam filed with his [Appellant's](#)  
8 [Index](#), Vol. 1 of 2, AA235-266, *Dam v. Waldron*, U.S. District Court, E.D.W.A.,  
9 Case No. 2:21-cv-00291, ECF No. 38 at 240-271.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed this 26<sup>th</sup> day of September 2023 in Seattle, Washington.

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13 s/ Pamela M. Egan  
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Pamela M. Egan  
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23 EGAN DECL. IN SUPP. OF CHAPTER  
24 7 TRUSTEE'S REPLY TO OBJECTION  
FILED BY MR. ELLISON [ECF NO. 1021] – Page 2  
25